

1 **DICKINSON WRIGHT PLLC**  
2 MICHAEL N. FEDER  
3 Nevada Bar No. 7332  
4 GABRIEL A. BLUMBERG  
5 Nevada Bar No. 12332  
6 3883 Howard Hughes Parkway, Suite 800  
7 Las Vegas, Nevada 89169  
8 Tel: (702) 550-4400  
9 Fax: (844) 670-6009  
10 Email: mfeder@dickinson-wright.com  
11 Email: gblumberg@dickinson-wright.com

12 *Attorneys for Defendant*  
13 *Cox Communications*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 LETICIA RODRIGUEZ,

17 Plaintiff,

18 vs.

19 NATIONAL CONSUMER TELECOM &  
20 UTILITIES EXCHANGE, INC., COX  
21 COMMUNICATIONS,

22 Defendants.

23 Case No. 2:21-CV-01407-JCM-BNW

24 **STIPULATION AND [PROPOSED]  
25 ORDER EXTENDING TIME FOR COX  
26 COMMUNICATIONS TO RESPOND TO  
27 PLAINTIFF'S COMPLAINT FOR  
28 DAMAGES PURSUANT TO THE FAIR  
CREDIT REPORTING ACT, 15 U.S.C. §  
1681 ET SEQ.**

**(THIRD REQUEST)**

20 Defendant Cox Communications (“Cox”), by and through its attorneys, Dickinson Wright  
21 PLLC, and Plaintiff Leticia Rodriguez (“Plaintiff”), by and through her attorneys, Krieger Law  
22 Group, LLC, stipulate and agree as follows:

23 1. Plaintiff filed her Complaint for Damages Pursuant to the Fair Credit Reporting  
24 Act, 15 U.S.C. § 1681, et seq. (First Request), on July 28, 2021 (the “Complaint”).

25 2. Plaintiff served Cox on July 30, 2021.

26 3. Pursuant to the Stipulation and Order approved by the Court on August 20, 2021,  
27 Cox’s deadline to respond, move or otherwise plead to the Complaint was extended to September

1 20, 2021.

2       4. Pursuant to the Stipulation and Order approved by the Court on September 15,  
3 2021, Cox's deadline to respond, move or otherwise plead to the Complaint was extended to  
4 October 8, 2021.

5       5. Plaintiff and Defendant have agreed that Cox shall have an additional extension up  
6 to and including October 29, 2021, to respond, move or otherwise plead to the Complaint to  
7 provide Cox with additional time to continue its investigation and review its records pertaining to  
8 the allegations in the Complaint.

9       6. The request for an extension is also so that Plaintiff can review her records  
10 pertaining to the allegations in the Complaint.

11       7. This is the third stipulation between Plaintiff and Cox to extend the time for Cox to  
12 respond, move or otherwise plead to the Complaint and it is not being entered into for purposes of  
13 any delay.

14 Dated: October 6<sup>th</sup>, 2021.

Dated: October 6<sup>th</sup> 2021.

15 **DICKINSON WRIGHT PLLC**

16 /s/:Michael N. Feder  
17 MICHAEL N. FEDER  
18 Nevada Bar No. 7332  
19 GABRIEL A. BLUMBERG  
20 Nevada Bar No. 12332  
21 3883 Howard Hughes Parkway, Suite 800  
22 Las Vegas, Nevada 89169  
Tel: (702) 550-4400  
Fax: (844) 670-6009  
Email: mfeder@dickinson-wright.com  
Email: gblumberg@dickinson-wright.com

23 Attorneys for Defendant  
24 Cox Communications

**KRIEGER LAW GROUP, LLC**

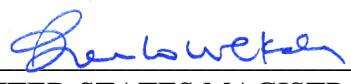
16 /s/:Shawn Miller  
17 DAVID KRIEGER  
18 Nevada Bar No. 9086  
19 SHAWN MILLER  
20 Nevada Bar No. 7825  
21 2850 W. Horizon Ridge Parkway, Suite 200  
22 Henderson, Nevada 89052  
Tel: (702) 848-3855  
Email: dkrieger@kriegerlawgroup.com  
Email: smiller@kriegerlawgroup.com

23 Attorneys for Plaintiff Leticia Rodriguez

25 \* \* \*  
26 **ORDER**

27 **IT IS SO ORDERED.**

28 DATED: October 7, 2021

  
UNITED STATES MAGISTRATE JUDGE

## **CERTIFICATE OF SERVICE**

The undersigned, an employee of Dickinson Wright PLLC, hereby certifies that on the 6<sup>th</sup> day of October, 2021, a copy of **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR COX COMMUNICATIONS TO RESPOND TO PLAINTIFF'S COMPLAINT FOR DAMAGES PURSUANT TO THE FAIR CREDIT REPORTING ACT, 15 U.S.C. § 1681 ET SEQ., (THIRD REQUEST)** was served electronically to all parties of interest through the Court's *CM/ECF system* as follows:

DAVID KRIEGER  
SHAWN MILLER  
**KRIEGER LAW GROUP, LLC**  
2850 W. Horizon Ridge Parkway, Suite 200  
Henderson, Nevada 89052  
Tel: (702) 848-3855  
Email: [dkrieger@kriegerlawgroup.com](mailto:dkrieger@kriegerlawgroup.com)  
Email: [smiller@kriegerlawgroup.com](mailto:smiller@kriegerlawgroup.com)

*Attorneys for Plaintiff Leticia Rodriguez*

/s/: Dianne Kelling  
An Employee of Dickinson Wright PLLC